

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

ARNULFO RODRIGUEZ,
Movant,

v.

UNITED STATES OF AMERICA,
Respondent.

No. 4:18-CV-876-O
(4:16-CR-029-O (4))

GOVERNMENT'S SECOND MOTION FOR EXTENSION OF TIME

The government respectfully requests a second, 30-day extension—to May 15, 2019—to file its response to Rodriguez's amended 28 U.S.C. § 2255 motion.

The extension is requested due to the undersigned's workload and so that the government can provide a thorough response to Rodriguez's amended claims. Counsel is working diligently on this matter as well as the rest of his caseload. Last week, I filed Section 2255 responses in *Marney v. United States*, 5:19-CV-030-C (N.D. Tex.), *Pasillas v. United States*, 4:18-CV-981-O (N.D. Tex.), and *Lopez v. United States*, 3:18-CV-3406-B-BK (N.D. Tex.). This week, I have another response due in *Johnson v. United States*, 4:19-CV-501-O (N.D. Tex.), and I am devoting a substantial amount of time preparing to present oral argument in *United States v. Hernandez*, No. 16-11150 (5th Cir.).

This extension is not sought for purposes of delay, and it will allow the government to provide the best response possible. The government requests that its deadline to file a response be extended to May 15, 2019.

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

s/ Jonathan Bradshaw
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CERTIFICATE OF CONFERENCE

I have not spoken to Rodriguez regarding this motion because he is incarcerated.

s/ Jonathan Bradshaw
Jonathan Bradshaw
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on April 15, 2019, I filed this motion with the clerk of court for the U.S. District Court, Northern District of Texas. A copy was sent to Arnulfo Rodriguez, Register No. 53753-177, BOP Giles W. Dalby CI, 805 N. Avenue F, Post, Texas 79356, by United States mail.

s/ Jonathan Bradshaw
Jonathan Bradshaw
Assistant United States Attorney